

## SUPERANNUATION VOTING TRANSPARENCY REPORT

### 1. Name of asset owner/ fund manager & fund name chosen to assist with queries below:

BT Financial Group (BTFG) is the wealth management division of the Westpac Group. Pandal Group (previously known as BT Investment Management (BTIM) is the listed company floated out of Westpac in 2007.)

BTFG is the trustee for \$92b in super assets including funds branded as Advance, Asgard, BT and Westpac.

### 2. Brief Description of Asset Owner

Arm of Westpac - operates retail super funds.

**Funds Under Management:** \$92b (as of 30/06/2017).

URL:

<http://www.apra.gov.au/Super/Publications/Pages/superannuation-fund-level-publications.aspx>

### 3. Memberships

Association	Membership
UNPRI	Yes
FSC	Yes
RIAA	Yes
ACSI	No

### 4. Do they publically disclose a clear policy on how ESG issues are incorporated in all of their equity investment activities (i.e not just for SRI funds?) and do they screen any particular industry?

BTFG has a Responsible Investment Position Statement. This document has no content specifying BTFG's attitude to any specific ESG issues other than in regards exclusions. BTFG has exclusions for tobacco, controversial weapons and activities which involve a severe breach of international norms - for example, child labour. In its answer to the UNPRI queries as to policy content dealing with formalised guidelines on E and S factors BTFG refers to Westpac material. Some

of this material, for example, the climate change position statement<sup>1</sup> is likely applicable to BTFG super funds though that it is not clear. The Westpac Group

Environmental Policy contains no material dealing with the super funds' policy attitude to any specific environmental issues. Much of the material is credit and banking focused. BTFG also has a Proxy Voting Policy but it contains no specific guidance on any E,S nor G matters.

URL:

<https://www.bt.com.au/content/dam/public/btfg-bt/documents/about-bt/disclosure/regulatory-reporting/BT-Super-proxy-voting-policy.pdf>  
[https://www.westpac.com.au/content/dam/public/wbc/documents/pdf/aw/sustainability/BTFG Responsible Investment Position Statement.pdf](https://www.westpac.com.au/content/dam/public/wbc/documents/pdf/aw/sustainability/BTFG%20Responsible%20Investment%20Position%20Statement.pdf)  
<https://www.westpac.com.au/about-westpac/sustainability/our-positions-and-perspectives/>  
<https://reporting.unpri.org/surveys/PRI-reporting-framework-2017/39E176FD-762F-414A-88DE-E43C4FAB2ABD/79894dbc337a40828d895f9402aa63de/html/2/?lang=English&a=1>

Score (1.25) (1 for having a policy, 0.25 for stating their attitude to climate change issues.)

##### **5. Do they publicly disclose their voting record for either or both their ASX and international holdings?**

Within this document, we have used Advance Asset Management's Advance Australian Shares Multi-blend fund as the flagship fund for the voting record. This is the record provided in the BTFG UNPRI transparency report for Proxy Voting Records. Votes are available dating back to January 2016 up-to-date. Only Australian records are available. No rationales are given.

URL:

<http://vds.issproxy.com/SearchPage.php?CustomerID=8870>

Score (2 out of 5)

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<sup>1</sup> See

<https://www.westpac.com.au/content/dam/public/wbc/documents/pdf/aw/sustainability/WestpacCCEActionPlan.pdf>.

## 6. DOMESTIC VOTING

July to December 2017 ASX						
	Theme of Proposal	For	Against	Abstain	Not Holding	Score
<b>BHP Billiton</b>	Amendment of Constitution Item no.22		X			-1
	Climate Change Item no.23	X				1
<b>Woolworths Group Limited</b>	Amendment of Constitution item no.7a		X			-1
	Human Rights Item no.7b	X				1
<b>URL: (Max score 4)Total</b>						<b>0</b>

January to June 2017 ASX						
	Theme of Proposal	For	Against	Abstain	Not Holding	Score
<b>Oil Search</b>	Climate Change item no.7		X			-1
	Human rights		X			-1
<b>Santos</b>	Amendment of Constitution item no.5a.		X			-1
	Climate Change item no.5b. (Strategic Resilience for 2035 and Beyond )		X			-1
<b>URL: (Max score 4)Total</b>						<b>-4</b>

## 7. INTERNATIONAL VOTING

Records not supplied.

The ISS page for Advance Asset Management referred to in the BTFG UNPRI transparency report does provide some international voting records. However, the UNPRI report and the page itself state that only Australian records are available. Because of these caveats and the lack of clarity as to the extent to which the Advance Asset management record reflects that of BTFG in general those international voting records available have not been used.

## 8. LAGGING

DOMESTIC RECORDS			
	Yes	No	Score
2017 Records available within 2 months of 2017 financial/calendar year end	X		1
Records available for current year to date, no more than two months ago available	X		1
June 2016 Records are available <sup>2</sup>	X		1
<b>(Max score 3) Total</b>			<b>3</b>

INTERNATIONAL RECORDS			
	Yes	No	Score
2017 Records available within 2 months of 2017 financial/calendar year end		X	0
Records available for current year to date, no more than two months ago available		X	0
June 2016 Records are available	X		0
<b>(Max score 3) Total</b>			<b>0</b>

<sup>2</sup> But not for full financial year - records start January 2016.

**9. Proxy Advisor used:**

ISS

**10. Since June 2015 has the Fund lead filed or co-filed any ESG related shareholder resolutions at ASX 100 listed companies?**

Not to the knowledge of ACCR.

**11. Prose:**

BTFG has a basic ESG policy. Westpac itself has an in-depth interest in climate change but the applicability of this interest to BTFG qua super trustee is not well spelt out. Westpac claims as its first core principle in regards climate change that "A transition to a net zero emissions economy is required."

Domestically, we identified 3 chances BTFG had in 2017 to support climate change response related resolutions and a transition to a net zero emissions economy. It supported one.

BTFG did support one of the 2 resolutions we identified related to human rights issues in this time.